

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 19-257(1) (MJD/KMM)
	)	
v. Plaintiff,	)	
	)	<b>DEFENDANT'S PRETRIAL MOTION</b>
AMANDA MARIE LETOURNEAU,	)	<b>TO DISCLOSE AND MAKE</b>
	)	<b>INFORMANTS AVAILABLE FOR</b>
Defendant.	)	<b>INTERVIEW</b>

Amanda Marie Letourneau, by and through her undersigned attorney, hereby moves the Court for an Order requiring the Government to disclose the identity of any informant or informants utilized by the Government in the investigation of the above-entitled matter, and to make such informants available for interview by Defendant's attorney in preparation for trial, and to disclose:

- 1) the prior criminal convictions of such informants,
- 2) all aliases used by the informants,
- 3) a chronological list of every contact law enforcement made with the informant in relation to and at the time of the investigation of Ms. Letourneau, including emails, texts, phone calls, notes from phone calls and face-to-face interactions,
- 4) all assistance, promises and other support provided to the informant or on behalf of the informant, including phone calls and emails to other prosecutors or law enforcement officials, and
- 5) all entries in the FBI "informant book" or DEA "informant log" related to the use or payments to the informants in this case.

This motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: November 12, 2019

Respectfully submitted,

*s/Shannon Elkins*

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